

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

United States of America,

Plaintiff,

v.

Albert Rossini,

Defendant.

No. 17 CR 522

Judge John J. Tharp

Motion to Reset Sentencing

Defendant, Albert Rossini, by and through undersigned counsel, respectfully requests the court strike the sentencing hearing, which is currently scheduled for December 16, 2024.

Mr. Rossini was convicted on all counts in the above-captioned case after a jury trial in July 2023. Post-trial motions were denied in June 2024 [195]. Mr. Rossini is currently serving a 132-month sentence on case number 15 CR 515 and as such, is not in danger of overserving any additional sentence in this case.

Mr. Rossini has a pending tax case in Chicago, which he anticipates will be set for trial in early 2025. He is currently preparing for the anticipated trial, which requires a voluminous amount of documents that may become unavailable to him if he is sentenced and relocated to another Bureau of Prisons facility before trial. Loss of access to his materials, even temporarily, will prejudice him in the anticipated tax trial. Counsel consulted with Mr. Rossini and he has approved the request to reset his sentencing hearing.

Due to Mr. Rossini's upcoming tax trial, counsel is requesting that the court strike Mr. Rossini's current sentencing date to allow him continued access to his

documents while he is preparing to litigate his tax trial. Counsel will work with the court's staff and opposing counsel to set a new sentencing date.

WHEREFORE, counsel respectfully requests that the December 16, 2024, sentencing hearing be stricken in order to allow Mr. Rossini's tax trial to proceed before sentencing in this case.

Respectfully Submitted,

/s/ James G. Vanzant

Attorney for Albert Rossini

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